

Remarks

Favorable reconsideration of this application is requested in view of the following remarks. For the reasons set forth below, Applicant respectfully submits that the claimed invention is allowable over the cited references.

The non-final Office Action dated November 28, 2003, indicated that prosecution has been reopened; claims 1-3, 6 and 7 are rejected under 35 U.S.C. § 102(e) over *Zhou* (U.S. Patent No. 6,172,409); and claims 4-5 are rejected under 35 U.S.C. § 103(a) over *Zhou* in view of *Wolf et al.* ("Silicon Processing for the VLSI Era: Vol. 1" p. 478) and *Banks* ("Introduction to Microengineering" p. 2).

Applicant respectfully traverses the Section 102(e) rejection because the Office Action fails to present correspondence between each of the claimed limitations and a prior art reference. The Office Action fails to identify where the '409 reference teaches any four-sided stepper shot having a scribe line along the perimeter of the stepper shot. The '409 reference appears to teach at column 5, lines 22-23, alignment marks located in a scribe line 32. Applicant fails to see any indication in the '409 reference or identification in the Office Action that scribe line 32 runs along the perimeter of a four-sided stepper shot. Without a presentation of correspondence to each of the claimed limitations, the Section 102(e) rejection cannot stand and Applicant accordingly requests that the rejection be withdrawn.

With particular respect to claim 3, the Office Action fails to identify teachings in the '409 reference directed to the claimed alignment target located at each corner of the stepper shot. Figure 1 of the '409 reference, cited by the Office Action, is a top view of an alignment structure and does not appear to show any stepper shot. Column 2, line 63. Thus, the Office Action fails to show correspondence to each of the limitations of claim 3.

With particular respect to claim 6, the Office Action fails to identify a second stepper shot in the '409 teachings. Moreover, the Office Action fails to identify any such second stepper shot having a scribe line along the perimeter and any segment of such a scribe line. Again, by failing to present complete correspondence to the claimed invention, the Section 102(e) rejection cannot be maintained. Applicant requests that the Section 102(e) rejection be withdrawn.


With respect to the Section 103(a) rejection of dependent claims 4 and 5, Applicant respectfully traverses because the Office Action fails to present correspondence to each of the claimed limitations as discussed above. Both claims 4 and 5 depend from claim 1 which was improperly rejected as discussed above. Without a presentation of correspondence between each of the claimed limitations and the cited references, the Section 103(a) rejection cannot stand. Applicant accordingly requests that the Section 103(a) rejection be withdrawn.

In view of the remarks above, Applicant believes that each of the rejections has been overcome and the application is in condition for allowance. Should there be any remaining issues that could be readily addressed over the telephone, the Examiner is asked to contact the agent overseeing the application file, Mr. Peter Zawilski, of Philips Corporation at (408) 474-9063.

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